



# Ivybridge Podiatry

## Privacy Policy



Ivybridge Podiatry is a healthcare company providing podiatry services on a fee-paying basis to the public.

### **What data we collect and why:**

#### **1. Personal**

We process personal information to enable us to provide health services to our patients, to maintain our accounts and records and to promote our services. We process information relevant to this. The information will include personal details such as name, address, date of birth and contact details. We will use your contact details to assist with the administration of your appointments and treatment as well as reminders about appointments.

We will also record goods and services provided by Ivybridge Podiatry along with associated financial transaction details. This does not include any credit or debit card details.

With your prior consent we may also use your contact information to inform you of special offers or new services that we may offer. If you do consent to receiving internal marketing you can withdraw that consent at any time by writing to The Data Controller at Ivybridge Podiatry, c/o Nature's Larder 10 Glanvilles Mill, Ivybridge, PL21 9PS, or by email to [feet@ivybridgepodiatry.com](mailto:feet@ivybridgepodiatry.com). ***We will not sell or share your information with any marketing company.***

#### **2. Medical**

We ask you to provide us with a medical history. We do this because, as responsible health practitioners, we want to ensure we provide the best health care we can. Medical notes are recorded after each appointment and pertinent communication relating to your health care. Your medical history and notes are held in accordance with The Private and Voluntary Health Care (England) Regulations 2001 which can be found at <http://www.legislation.gov.uk/ukxi/2001/3968/made>

All paperwork with personal and medical data provided by patients is held securely until the information is transferred to Cliniko after which the paperwork is destroyed or returned to the patient if requested.

### **Sometimes it is necessary to share some of your information, so who will we share it with?**

There may be occasions when we will need to share part or all of the data and records we hold with your General Practitioner or other healthcare professional, your healthcare insurer, your parent/guardian if a minor or your carer.

We will share clients contact details with Best Reception, who provide a remote reception service, for the purpose of accurate identification when administering appointments. Best Reception will not have access to any medical records. Their privacy policy can be found at <http://www.bestreception.co.uk/privacy-notice>.

When we do have to share data, it will be following The General Data Protection Regulation (GDPR) (EU) 2016/679. We are also registered with the Information Controllers Office (ICO).

### **Who is our data controller?**

Our podiatrist, Jackie Thomas, is responsible for overseeing our data protection. She can be contacted at the clinic or by email at [feet@ivybridgepodiatry.com](mailto:feet@ivybridgepodiatry.com)

### **Who is the Data Processor?**

The data processor for our diary and medical notes is Red Guava Pty. Ltd using a system called Cliniko. At our clinic Cliniko can only be accessed via a dual password process. The location of the stored data is compliant with UK GDPR as the servers are located in USA and Australia which is while it is outside the EEA, Cliniko and their subprocessors have made sure their systems are compliant with the relevant legislation. More information can be found at <https://www.cliniko.com/files/cliniko-eu-data-processing-addendum-v20210916.pdf>. I have signed a data processing

addendum on behalf of Ivybridge Podiatry so that Cliniko can legally process your patient information even though they aren't located physically in the UK.

### **Your right to be forgotten:**

While you may withdraw your consent for us to hold your data at any time, your right to be forgotten cannot override the legal requirement to keep medical notes for the mandatory period. This can vary in length depending on your age and ability to consent, but it will be for a minimum of eight years after your last consultation. Full details can be found in Schedule 3, Part I of The Private and Voluntary Health Care (England) Regulations 2001.

Withdrawal of consent and requests to be forgotten should be addressed to The Data Controller at Ivybridge Podiatry, c/o Nature's Larder, 10 Glanvilles Mill, Ivybridge, PL21 9PS, or by email to [feet@ivybridgepodiatry.com](mailto:feet@ivybridgepodiatry.com)

### **Your right to be informed:**

As part of an individual's right to know what data is being collected about them and why, Ivybridge Podiatry will inform patients, through its Privacy Policy and by information on the forms it asks its patients to complete, why it is collecting their data and for what purpose.

Whenever data is to be shared with a third party in accordance with given consent, wherever possible Ivybridge Podiatry will inform the patient, verbally or in writing, before this happens. Ivybridge Podiatry will never share patient data with anyone other than those to whom we have received consent unless required to by law. e.g. police or social services on welfare issues.

### **Your right of access:**

Patients have the right to see what data is being held on them. To request a copy of the data please write to the Data Controller at Ivybridge Podiatry, c/o Nature's Larder, 10 Glanvilles Mill, Ivybridge, PL21 9PS, or by email to [feet@ivybridgepodiatry.com](mailto:feet@ivybridgepodiatry.com)

### **Your right to rectification:**

Data will be checked and updated from time to time, primarily at annual review appointments. Patients can request that we update data we hold (e.g. change of address) or correct any inaccurate data in writing to the Data Controller at Ivybridge Podiatry, c/o Nature's Larder, 10 Glanvilles Mill, Ivybridge, PL21 9PS, or by email to [feet@ivybridgepodiatry.com](mailto:feet@ivybridgepodiatry.com)

### **Our website:**

Our website, [www.ivybridgepodiatry.com](http://www.ivybridgepodiatry.com), is provided and managed by Yell.com. The privacy and cookie policy for Yell can be found by following the terms and conditions link on the website or at <https://dd-cdn.multiscreensite.com/yell/html/terms-and-conditions.html>

### **Transfer of business:**

If Ivybridge Podiatry is sold to another company, please be assured that your data will be transferred in accordance with the UK GDPR regulations. The new owner will review the privacy policy and update it as necessary. You will be informed and given the opportunity to object, although your medical records will need to be kept safely for the requisite time period as described in section 2. Should the company cease trading, the records will remain in safe keeping until such time as the regulations allow them to be deleted.

### **Updates:**

Occasionally it will be necessary to update this Privacy Policy. You can always see the latest version on my website. The last update date will be in the footer. If the change is substantial, you will receive a notification of the changes by email. Minor changes which do not affect the use of your data will not be notified. A copy is also available to view in the clinic or on request for those people who do not use email.